

Message

From: Jann, Stephen [jann.stephen@epa.gov]
Sent: 9/30/2019 3:59:23 PM
To: Topinka, Natalie [topinka.natalie@epa.gov]
Subject: FW: UOG POC: OOOOa Policy Package in FR and Pigging Compliance Alert

From: Garvey, Megan <garvey.megan@epa.gov>
Sent: Wednesday, September 25, 2019 9:11 AM
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Subject: UOG POC: OOOOa Policy Package in FR and Pigging Compliance Alert

Good morning, UOG POC,

Two announcements:

Yesterday, the Proposed Policy Amendments 2012 and 2016 New Source Performance Standards for the Oil and Natural Gas Industry was published at [84 FR 50244](#) . Additional information such as public hearing and how to comment can be found [here](#).

Today, we posted a new Compliance Alert for pigging operations: <https://www.epa.gov/enforcement/epa-observes-air-emissions-natural-gas-gathering-operations-violation-clean-air-act>

The CAA noncompliance we identified is due to excess emissions from depressurizing pig launchers and receivers in natural gas gathering operations. Some SIPs require companies to obtain an air permit for the pigging equipment and in most areas a company must determine the mass emissions of pollutants when applying for that permit (or claiming that they are exempt from permitting requirements). We have seen several examples of companies failing to properly calculate the potential for VOC or HAP emissions from pigging operations or otherwise underestimating the mass of pollutants released during pigging operations. The alert discusses: (1) non-compliance concerns, (2) why pigging is sometimes necessary to efficiently transport gas through a pipeline and how that activity can result in excess emissions, (3) and engineering solutions to address these identified problems.

Thanks, Megan

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